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6 UNITED STATES DISTRICT COURT
7 FOR THE WESTERN DISTRICT OF WASHINGTON
8 AT SEATTLE

9 SHANE LAFFERTY,

10 Plaintiff,

11 vs.

12 CHRISTOPHER LIU et al.

13 Defendants.
14

No. C17-749 RSM

SECOND STIPULATED MOTION TO
CONTINUE TRIAL DATE AND
MODIFY PRETRIAL DEADLINES

15 **STIPULATION**

16 Defendant David Heenan, by and through his counsel Stephen T. LeCuyer, Thomas B.
17 Nedderman, and John A. Safarli, Defendant Hudson Insurance Company (“Hudson”), by and
18 through its counsel William W. Spencer, and Plaintiff Shane Lafferty, by and through his counsel
19 William J. Johnston (collectively, “the Parties”) respectfully request this Court continue the trial
20 date that is currently set for May 7, 2018, Dkt. #17, and modify the pretrial deadlines accordingly.

21 This matter was originally filed in Whatcom County Superior Court on March 6, 2017.
22 The Parties initially stipulated to continue trial because Heenan was served after the trial date
23 was first set. *See* Dkt. #15. The Court granted the parties’ motion on August 1, 2017. Dkt. #16.
24 It ordered trial for May 7, 2018, with the parties’ expert disclosures due on November 8, 2017

25 SECOND STIPULATED MOTION TO CONTINUE
TRIAL DATE AND MODIFY PRETRIAL
DEADLINES - 1

No. 2:17-CV-00749-RSM

FLOYD, PFLUEGER & RINGER P.S.

200 W. THOMAS ST., SUITE 500
SEATTLE, WA 98119-4296

TEL 206 441-4455
FAX 206 441-8484

1 and discovery completed by January 8, 2018. Dkt. #17.

2 Heenan propounded interrogatories and requests for production upon Lafferty on August
3 30, 2017. After the 30-day response deadline passed, Heenan set a discovery conference on
4 October 9, 2017, in which Lafferty failed to participate. Heenan was only contacted by Lafferty
5 on October 26, 2017 after five attempted communications, and only a few days before a Motion
6 to Compel was to be filed. In lieu of filing said motion immediately, Lafferty agreed to cooperate
7 with Heenan's requested discovery and stipulate to a trial continuance—including a
8 postponement of pre-trial deadlines—so Heenan could adequately prepare his defense, which he
9 was not previously able to do without discovery responses from Lafferty.¹
10

11 Accordingly, the Parties respectfully request that this Court continue the trial date until
12 October 2018, and modify the pretrial dates accordingly.

13 RESPECTFULLY SUBMITTED THIS 31st day of October, 2017.

14 FLOYD, PFLUEGER & RINGER, P.S.

15 By: s/ Thomas B. Nedderman

16 Thomas B. Nedderman

17 tnedderman@floyd-ringer.com

18 John A. Safarli

19 jsafarli@floyd-ringer.com

20 200 W. Thomas Street, Suite 500

21 Seattle, WA 98119-4296

22 Tel (206) 441-4455

23 Fax (206) 441-8484

24 OFFICE OF THE TRIBAL ATTORNEY

25 SWINOMISH INDIAN TRIBAL COMMUNITY

By: s/ Stephen T. LeCuyer

Stephen T. LeCuyer

slecuyer@swinomish.nsn.us

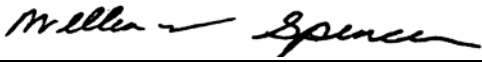
11404 Moorage Way

¹ Heenan reserves his right to file a motion to compel if Lafferty's discovery responses and disclosures remain inadequate or untimely.

1 La Conner, WA 98257
2 Tel (360) 466-1058

3 *Attorneys for Defendant David Heenan*

4 MURRAY DUNHAM & MURRAY

5 By: 

6 William W. Spencer
7 william@murraydunham.com
8 P.O. Box 9844
9 Seattle, WA 98109-0844
10 Tel (206) 622-2655

11 *Attorney for Hudson Insurance Company*

12 WILLIAM J. JOHNSTON

13 By: s/ William J. Johnston

14 William J. Johnston
15 wjtj47@gmail.com
16 401 Central Ave.
17 Bellingham, WA 98225
18 Tel (360) 676-1931
19 Fax (360) 676-1931

20 *Attorney for Plaintiff Shane Lafferty*

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23
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25 SECOND STIPULATED MOTION TO CONTINUE
TRIAL DATE AND MODIFY PRETRIAL
DEADLINES - 3

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FAX 206 441-8484

1 **ORDER**

2 The trial date is continued from May 7, 2018, to October 22, 2018, and the pretrial
3 deadlines will be adjusted accordingly.

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5 Dated this 2nd day of November 2017.

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7 RICARDO S. MARTINEZ
8 CHIEF UNITED STATES DISTRICT JUDGE
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25 SECOND STIPULATED MOTION TO CONTINUE
TRIAL DATE AND MODIFY PRETRIAL
DEADLINES - 4

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SEATTLE, WA 98119-4296
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FAX 206 441-8484